

THE HONORABLE TANA LIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

PORT OF SEATTLE,

Plaintiff,

v.

DONALD WANG, an individual,

Defendant.

Case No. 2:24-cv-735-TL

PORT OF SEATTLE'S MOTION FOR
ATTORNEY FEES

IN ADMIRALTY

NOTED FOR CONSIDERATION
September 19, 2025

Comes now the plaintiff Port of Seattle ("the Port") and pursuant to the Court's July 30, 2025 Order on Motion for Summary Judgment (Dkt. No. 53) submits its motion for attorney fees.

In its Order, the Court found that as the prevailing party, the Port is entitled under Moorage Tariff No. 6 to payment by Donald Wang for its "actual" attorney's fees not to exceed fifty percent (50%) of the amount claimed in the Port's suit for collection of delinquent accounts. *Id.* at 14, ll. 14-18. The Court further found that the Port is entitled to recover \$136,671.09 for unpaid moorage fees, electric service charges, taxes and late fees related to moorage of the ALMA and THOR at the Port and, therefore, is entitled to recover attorney fees in an amount not to exceed \$68,335.54. *Id.* at 15, l. 17. As attested to in the Declaration of Charles Jordan, the Port's actual attorney's fees incurred pursuing recovery of unpaid moorage and utilities amounts to \$74,624.90, substantially exceeding the maximum amount the Court determined the Port is entitled to recover.

1 For the reasons set forth above, the Port respectfully requests the Court award the Plaintiff
2 Port of Seattle's attorneys' fees and costs in the amount of \$68,335.54.

3 *I certify this memorandum contains 450 words in compliance with the local rules.*

4 Dated: August 29, 2025.

5 BRYAN CAVE LEIGHTON PAISNER LLP

6 By: s/ Charles Jordan

7 s/ Michelle Buhler

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16 *Attorneys for Plaintiff*

CERTIFICATION OF CONFERRAL

I the undersigned declare under penalty of perjury that on August 25, 2025, I attempted to contact Defendant Donald Wang by telephone and e-mail to discuss the contents of the foregoing motion and the evidence relied on regarding the same. Mr. Wang has not responded. See Declaration of Charles S. Jordan filed herewith.

Dated: August 26, 2025, at Seattle, Washington.

s/ Chip Jordan
Chip Jordan, WSBA No. 19206

CERTIFICATE OF SERVICE

I the undersigned certify as follows: I am over the age of 18 years and am not a party to this action. On August 29, 2025, I served the foregoing document in the manner described below.

Donald Wang
392 Loma Drive, Apt. 201
Los Angeles, CA 90017

- ☐ Via U.S. Mail
- ☐ Via Hand Delivery
- ☐ Via Facsimile
- ☒ Via E-mail: Skyway420@gmail.com
- ☒ Via CM/ECF

Plaintiff pro se

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 29th day of August 2025.

s/ Shawn Williams
Shawn Williams